

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:23-cr-00380-SRC-PLC
)	
SONNY SAGGAR, M.D., and RENITA)	
BARRINGER,)	
)	
Defendants.)	

**UNITED STATES OF AMERICA’S RESPONSE TO DEFENDANTS’
MOTION REGARDING THE FILING OF PRETRIAL MOTIONS**

COMES NOW the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Amy E. Sestric, Assistant United States Attorney for said District, and responds to Defendants’ Motion Regarding the Filing of Pretrial Motions (ECF No. 51):

On July 26, 2023, a federal grand jury charged defendants Sonny Saggar, M.D., and Renita Barringer (“Defendants”) with one count of conspiracy (in violation of 18 U.S.C. § 371) and eight counts of making false statements related to health care matters (in violation of 18 U.S.C. §§ 1035 and 2). Since then, the United States has worked diligently to produce discovery to Defendants. Specifically, the United States has made five discovery productions, which are comprised of voluminous materials, including: documentation from the Missouri Board of Registration for the Healing Arts; Medicare and Medicaid enrollment documents and claims data; claims data from private insurance companies; travel records; copies of cellular telephones; data from Missouri’s Prescription Drug Monitoring Program; and copies of various computers and other electronic devices seized during the search of the Defendants’ downtown St. Louis urgent care clinic. The

United States is continuing to process and produce additional discovery on a rolling basis, and, given the volume of materials in this case, the United States concurs with Defendants' request to continue their deadline for filing pretrial motions until January 31, 2024.

However, the United States opposes Defendants' request for a piecemeal approach to pretrial motions and respectfully asks that the Court deny Defendants' motion to the extent it seeks a separate briefing schedule pertaining to Defendants' Motion to Dismiss Indictment Based on the Court's Lack of Jurisdiction (ECF No. 49). For reasons of judicial economy, the Government asks the Court to enter an order setting the deadlines for all pretrial motions as a whole.

WHEREFORE, the United States respectfully (1) concurs in Defendants' request for an order setting January 31, 2024 as the deadline for pretrial motions; and (2) asks that the Court deny Defendants' request for a separate briefing schedule pertaining to their pending Motion to Dismiss Indictment Based on the Court's Lack of Jurisdiction (ECF No. 49).

Date: October 20, 2023

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

/s/ Amy E. Sestric
AMY E. SESTRIC, #66219MO
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on October 20, 2023, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all Counsel of Record.

/s/ Amy E. Sestric
AMY E. SESTRIC, #66219MO
Assistant United States Attorney